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April 12, 2024

BY ECF

The Honorable LaShann DeArcy Hall United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: *United States v. Sun Soo (Steve) Chon*, 22-CR-259 (LDH)

Dear Judge DeArcy Hall:

I am counsel to defendant Steve Chon and write to request that Mr. Chon be permitted to travel to Mexico for a family vacation from on or about May 25, 2024, to on or about June 1, 2024.

On January 26, 2024, Your Honor sentenced Mr. Chon to two years' probation and ordered that he pay a \$25,000 fine, a \$100 special assessment, restitution in the amount of \$199,238, and that he complete 150 hours of community service during the term of probation. It is my understanding that Mr. Chon has satisfied all the financial components of his sentence, has already completed a substantial number of community service hours, and that the Probation Department has designated him to the Low Intensity Unit for continued supervision.

I have conferred with counsel for the government and with the Probation Department, and there is no objection to this travel request. Probation has advised me that because this request involves international travel an order from the Court is required before the trip can be approved. Therefore, I respectfully request that the Court "so order" a copy of this letter motion.

Respectfully submitted,

/s/Brian P. Ketcham Brian P. Ketcham

Cc: Jorge Almonte, Assistant Chief, DOJ Tax Division (via ECF) USPO Lisa Famularo (via email)